

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
Clerk's Office
USDC, Mass.
Date 12-13-04
By [Signature]
Deputy Clerk

JUDITH RÉ,)	
)	
Plaintiff,)	
)	
v.)	Civil No. 04-11385-RGS
)	
JODI R.R. SMITH, and)	
BARNES & NOBLE INC.)	
Defendants.)	

AFFIDAVIT OF ANITA COTTER

I, ANITA COTTER, state the following on my own personal knowledge:

1. I am familiar with Judith Ré and her SOCIAL SAVVY® brand of etiquette instruction. From December 1989 until 2000 I worked directly with Ms. Ré as the Director of Public Relations for two New York luxury hotels: the Ritz-Carlton, New York on Central Park South and the New York Palace Hotel.

2. From 1989 until 1995, I was the Director for Public Relations for the Ritz-Carlton, New York. Beginning in December 1989, the Ritz-Carlton, New York hired Ms. Ré to host her "Day of SOCIAL SAVVY®" etiquette instruction program at the hotel. Under this arrangement, Ms. Ré hosted her "Day of SOCIAL SAVVY®" etiquette instruction program 3 or 4 times a year. Ms. Ré's "Day of SOCIAL SAVVY®" etiquette program was aimed mainly at teenagers and adolescents. The Ritz-Carlton, New York publicized Ms. Ré's programs by routinely sending out a brochure to guests and persons on our mailing list.

3. In 1995, I left the Ritz-Carlton to become the Director of Public Relations for the New York Palace Hotel, which is another New York city luxury hotel. While at the Palace Hotel, we decided to hire Ms. Ré to host her SOCIAL SAVVY® brand of etiquette instruction.


We did not want a program aimed at adolescents so we asked her to teach a program for adults. Starting in 1998, Ms. Ré began hosting 2 or 3 annual etiquette instruction classes called "SOCIAL SAVVY® for Business." Ms. Ré's "SOCIAL SAVVY® for Business" etiquette instruction class received a lot of press coverage. I am aware that the USA Today, New York Metro, CNN and the BBC all came to the hotel to develop stories about Ms. Ré's program. In addition, Ms. Ré's SOCIAL SAVVY® etiquette instruction twice won annual awards from the Hospitality Sales & Marketing Association.

4. While I was at the Ritz-Carlton and Palace hotels I was personally familiar with the registration process for Ms. Ré's SOCIAL SAVVY® etiquette instruction classes. Often when people called to register for Ms. Ré's class they did so by referring to it as the SOCIAL SAVVY® etiquette class. Registrants frequently knew of the class under its SOCIAL SAVVY® trade name and asked to take the class with the SOCIAL SAVVY® woman.

5. I left the Palace Hotel in 2000 to become the Americas Director of Public Relations for the Savoy Group. The Savoy Group operates four luxury hotels in the United Kingdom. I continue to work with The Savoy Group today.

6. Throughout my 15 years in the luxury hotel industry I have become familiar with other etiquette instruction programs and courses. Often etiquette instructors take clients to our hotels to instruct on dinner or other business etiquette. During the past 15 years I am unfamiliar with any other etiquette instructor who used the words SOCIAL SAVVY® to describe their etiquette instruction or to describe their services. Rather, my experience is that Ms Ré's niche in the etiquette industry is her SOCIAL SAVVY® brand. SOCIAL SAVVY® in the etiquette industry means Ms. Ré.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 13th DAY OF
December, 2004.



Anita Cotter